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Attorneys for Defendant

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA;

Plaintiff,

vs.

SHARIMA PANDAY,

Defendant.

CASE NO.: 2:23-mj-00352-BNW

**STIPULATION TO AMEND AND
CLOSE CASE**

IT IS HEREBY STIPULATED and AGREED, by and between SHARIMA PANDAY, by and through her counsel, TONY L. ABBATANGELO, ESQ., United State Attorney, and by IMANI DIXON, Assistant United States Attorney, counsel for the United States of America, that Count One of the Complaint be amended to Reckless Driving, in violation of Title 36 C.R.R. § 4.2 and N.R.S. 484B.653 and that the above-captioned matter be closed.

This stipulation is entered into for the following reasons:

1. On or about August 2, 2023 Defendant entered in a Petty Offense Plea Agreement with the United States in which she agreed to plead guilty to the Count One of the Complaint,

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Operating a Motor Vehicle while Under the Influence of Alcohol, in violation of Title 36 C.F.R. § 4.23(a)(1). *See* Doc No. 7.

2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$500.00 fine and a mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1) DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online alcohol awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six months; (v) not violate any local, state, or federal laws.
3. The parties further agreed that should the Defendant successfully complete condition, i, ii, iii, iv, and v within the first six months of her unsupervised probation, and has not violated any local, state, or federal laws during the first six months of her unsupervised probation, the parties shall jointly move to amend Count One to a charge of Reckless Driving, a violation of Title 36 C.F.R. § 4.2 and N.R.S. 484B.653. The Defendant will plead guilty to the amended Count One, and the parties will jointly agree that the original sentence be applied to the Reckless Driving conviction.
4. On August 2, 2023 this Court sentenced defendant pursuant to parties' plea agreement. *See* Doc No. 9.

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5. Since commencing her term of unsupervised probation, defendant has successfully completed conditions (i), (ii), (iii), and (iv).
6. The Defendant hereby moves, pursuant to the plea agreement, to withdraw her guilty plea to Count One of Operating a Motor Vehicle while Under the Influence of Alcohol, in violation of Title 36 C.F.R § 4.23(a)(1).
7. The government hereby moves, pursuant to the plea agreement to amend Count One of the Complaint to a charge of Reckless Driving, a violation of Title 36 C.F.R. § 4.2 and N.R.S. 484B.653.
8. Defendant hereby pleads guilty to the amended Count One of the Complaint.
9. The parties jointly request that the original sentence be applied to the Reckless Driving conviction and that the above-captioned matter be closed.

DATED this 2nd day of February, 2024.

Respectfully submitted,

PAUL PADDA LAW, PLLC

JASON M. FRIERSON
UNITED STATES ATTORNEY

By: /s/: Tony L. Abbatangelo
TONY L. ABBATANGELO, ESQ.
Attorneys for Defendant
Sharima Panday

By: /s/ Imani Dixon
IMANI DIXON, ESQ.
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA;

Plaintiff,

vs.

SHARIMA PANDAY,

Defendant.

CASE NO.: 2:23-mj-00352-BNW

**ORDER TO AMEND AND CLOSE THE
CASE**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Defendant SHARIMA PANDAY has successfully completed the conditions of her sentencing.
2. Defendant pleads guilty to the amended Count One, to the charge of Reckless Driving, a violation of Title 36 CFR § 4.2 and N.R.S. 484B.653.

ORDER

IT IS HEREBY ORDERED that the original sentence be applied to the amended Count One of the Complaint.

IT IS FURTHER ORDERED that the parties move the Court in the above-captioned matter case be closed, as all requirements have been completed.

Dated: 2/5/2024



UNITED STATES MAGISTRATE JUDGE